



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

MAA/LB/CJN  
F. #2017R05903

*271 Cadman Plaza East  
Brooklyn, New York 11201*

August 2, 2023

By Email and ECF

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Re: United States v. Huawei Technologies Co., Ltd., et al.  
Criminal Docket No. 18-457 (S-3) (AMD)

Dear Counsel:

Enclosed please find the government's production of discovery, which supplements the government's previous productions. The government is producing this discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure and, in an abundance of caution, with Brady v. Maryland, 373 U.S. 83 (1963). The discovery is being produced pursuant to the Protective Order entered by the Court on June 10, 2019 ("the Protective Order"). See ECF Docket Entry No. 57. The government also requests reciprocal discovery from the defendants.

I. The Government's Discovery

<b>Document Description</b>	<b>Category of Discovery Pursuant to Protective Order</b>	<b>Bates Range</b>
Financial institution records.	Discovery Material ("DM")	DOJ_HUAWEI_A_0117029840 – DOJ_HUAWEI_A_0117029859
Federal Bureau of Investigation records.	Sensitive Discovery Material	DOJ_HUAWEI_A_0117029860 – DOJ_HUAWEI_A_0117029875
Federal Bureau of Investigation records.	DM	DOJ_HUAWEI_A_0117029876 – DOJ_HUAWEI_A_0117029886

Very truly yours,

CAROLYN POKORNY  
Attorney for the United States,  
Acting Under Authority Conferred by 28  
U.S.C. § 515,  
Eastern District of New York

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